

EPA Comment on OPP-2003-0324

The EPA is currently considering registration applications for a wood treatment product commonly known within the industry as ACC (Acetic Copper Chromate). Arch Wood Treatment has applied for a registration of ACC and Osmose has requested a withdrawal of its ACC registration. It is vital that the registration application by Arch Wood Treatment be approved, and that Osmose not be allowed to withdraw its registration.

The continued use of ACC as a wood treatment preservative is necessary not only to the survival of wood treatment facilities, but also to the power generating and cooling tower industry. Should the registrations of ACC not be approved the adverse effects will not only be felt by these industries, but also by the public in higher energy costs and the use of other wood treatment products which contain high amounts of soluble copper.

Recently the EPA retained and changed the label for the use of CCA, limiting it to commercial and marine uses. Unfortunately, one of the applications not included on the new CCA label is the American Wood-Preservers' (AWPA) Standard C30-91 which applies to the treatment of lumber and plywood used in industrial field erected cooling towers. These cooling towers play an integral role in the thermal operations of power generation facilities, refineries, chemical processors, and large HVAC systems. The durability and leach effectiveness of CCA and ACC have resulted in these products being the leading preservatives in the treating of lumber and plywood for the manufacturing of wood cooling towers.

The structural lumber and plywood used in the construction of cooling towers is treated according to standards set forth by the Cooling Technology Institute (CTI). This standard, CTI STD-112, is very specific in its application, and references the AWWA standard for "Soil and Fresh Water Use" C1, C2, and C9 requirements. Due to an apparent oversight the AWWA C30-91 standard, CCA and Acetic Copper Chromate (ACC) were temporarily removed from the AWWA Book of Standards without prejudice in 2001 and then reinstated in 2002 Standards, at the request of the Utility Solid Waste Action Group.

The treatment of structural wood components for the repair and construction of cooling towers falls outside the use intended for residential and playground applications and is a commercial use. There is some confusion in the industry at this time because the EPA approved label refers to the 2001 AWWA C30-91 standard which did not include cooling towers.

Approximately 95% of the wood projects for cooling towers scheduled for 2004/2005 will use CCA or ACC as the wood preservative. It is estimated that approximately 25 million board feet of lumber is used annually in the new construction and after-market repairs of cooling towers. Although the Cooling Technology Institute uses other preservatives, the chemicals being introduced in 2004, specifically Copper Azole and ACQ, have not been field tested for durability or leach effectiveness. It is also a concern of some of cooling tower engineers and water treatment specialists that the high concentration of copper in

Copper Azole and ACQ will have adverse effects on the leaching process.

Unfortunately, Osmose, the only company registered to distribute ACC, withdrew its registration to focus on the production of CCA. This abrupt withdrawal by Osmose has caused problems in the wood treating industry generally, and the cooling tower industry specifically.

The wood treatment and cooling tower industry is seeking to reject Osmose's registration withdrawal of ACC for several reasons:

1. The cooling tower industry's preference is to use ACC as its wood treatment. There is over 50 years of data regarding the leaching of ACC in cooling tower applications. This data demonstrates that there is little leaching which occurs with the use of ACC, and that it is a very stable product.
2. There will be no EPA approved wood treatments for fresh water cooling towers after December 31, 2003 unless there is a change in the ACC or CCA registration.
3. The error in labeling the cooling tower industry as a residential use under the 2001 standard.
4. There is little likelihood of wood treated for cooling towers making its way into residential applications because:
 - i. The wood used for cooling towers is expensive heart wood Douglas Fir making it generally too expensive for residential applications
 - ii. The wood is pre-engineered and pre-cut making it useless for any application other than cooling towers
 - iii. The treatment used on cooling tower wood is more extensive (treatment to refusal) and thus more expensive than used for residential applications
 - iv. The high water soluble copper and heavy metal content in alternative chemicals.

If ACC is removed from the market as a wood treatment for fabricated wood components in cooling tower construction there will be adverse effects throughout industry in the United States and abroad. The ramifications of such an action will impact end users from power generators to light industrial users nationwide.